

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
Houston Division**

STUDIO WEST PRODUCTIONS INC.)
)
 Plaintiff,)
)
 v.) **Case No. 4:12-cv-3690**
)
 DOES 1 – 237)
)
 Defendants.)
)

**PLAINTIFF’S MOTION FOR EXTENSION OF TIME
REGARDING INITIAL PRETRIAL AND SCHEDULING CONFERENCE**

COMES NOW, Plaintiff, STUDIO WEST PRODUCTIONS INC. (“Plaintiff”), and files this Motion For Extension of Time Regarding Initial Pretrial and Scheduling Conference. For the reasons contained herein, Plaintiff respectfully requests this Court reset the Initial Pretrial and Scheduling Conference currently set for March 1 2013, at 10:30 a.m., and all other corresponding matters related to said Scheduling Conference, for a date no less than 120 days from the current settings.

1. On December 20, 2012 Plaintiff filed its initial Complaint and a subsequent Motion for Expedited Discovery seeking identification information of certain internet subscribers from the named Internet Service Providers (“ISPs”) in possession of such information and pertaining to the unnamed Doe Defendants involved with this particular matter. [See Docs. No. 1, 6].

2. On December 21, 2012, this Court, by way of its Order for Pretrial Conference (the “December 21, 2012 Order”), ordered that counsel for all parties appear for an Initial Pretrial and Scheduling Conference before the Honorable Keith P. Ellison, on March 1, at 10:30 a.m. [See Doc. No.6].

1 3. On January 8, 2013, Plaintiff filed a Motion for Expedited Discovery. [*See* Doc.
2 No. 6]. However, as of the filing of this present motion this Court has not ruled on Plaintiff's
3 Motion for Expedited Discovery. Accordingly, Plaintiff has not been able to identify or serve
4 any Defendants in this matter.

5 4. Plaintiff respectfully submits that it still needs a reasonable time period to: (i)
6 issue subpoenas to the ISPs in an effort to identify Doe Defendants; (ii) receive responses from
7 the ISPs to such subpoenas; (iii) serve limited discovery on the Internet subscribers identified
8 by the ISPs and allow a reasonable time period for such Internet subscribers to respond to such
9 discovery, and (iv) discover the identities of the proper Defendants and serve such Defendants.
10 As such, Plaintiff does not reasonably anticipate accomplishing all of the above on or before
11 March 1, 2013, the current deadline to conduct the Rule 26(f) conference.
12

13 5. Consequently, Plaintiff respectfully requests this Court reset the Initial Pretrial
14 and Scheduling Conference, which is currently set for March 1, 2013, at 10:30 a.m., and all
15 other corresponding matters related to said Initial Pretrial and Scheduling Conference, for a
16 date no less than 120 days from the current settings.
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Respectfully submitted,

DATED: February 26, 2013

STUDIO WEST PRODUCTIONS INC.

By: /s/ John W. Raggio
John W. Raggio ▪ Texas Bar No. 24041739
The Raggio Law Firm, P.C.
4925 Greenville Ave., Ste. 711
Dallas, Texas 75206
Tel: 214-461-6182
Fax: 214-594-8404
Email: jraggio@raggiofirm.com
Counsel for the Plaintiff

DUNLAPWEAVER, PLLC
199 Liberty Street SW
Leesburg, Virginia 20175
Telephone: 703-777-7319
Facsimile: 703-777-3656
Email: subpoena@dglegal.com
Co-Counsel for the Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on February 26, 2013, a true and correct copy of the foregoing
MOTION FOR EXTENSION was filed using the Court's ECF

/s/ John Raggio
John Raggio